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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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RASHETA BUNTING, Individually and as the
representative of a class of similarly situated persons,

Case No. 24-cv-6129

Plaintiff,

- against -

CLUB PILATES FRANCHISE, LLC and
XPONENTIAL FITNESS, INC.,

Defendants.

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COMPLAINT – CLASS ACTION

INTRODUCTION

1. Plaintiff, Rasheta Bunting (“Plaintiff” or “Bunting”), brings this action on behalf of herself and all other persons similarly situated against Club Pilates Franchise, LLC and Xponential Fitness, Inc. (hereinafter jointly referred to as “Xponential Fitness” or “Defendants”), and states as follows:

2. Plaintiff is a visually-impaired and legally blind person who requires screen-reading software to read website content using her computer. Plaintiff uses the terms “blind” or “visually-impaired” to refer to all people with visual impairments who meet the legal definition of blindness in that they have a visual acuity with correction of less than or equal to 20 x 200. Some blind people who meet this definition have limited vision; others have no vision.